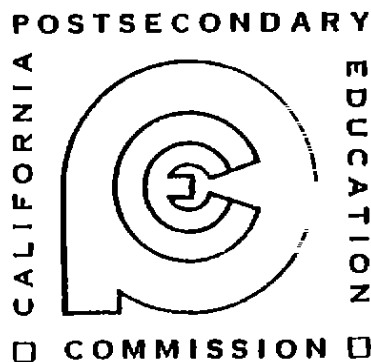


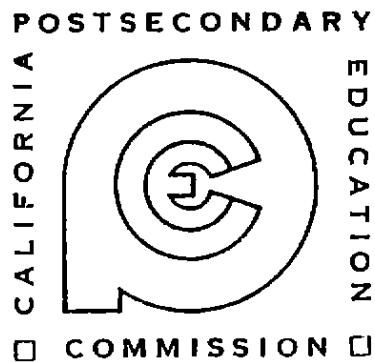
**REPORT PURSUANT TO SB 707
CONCERNING ACCREDITATION
PROCEDURES AND PROCESSES
March 1984**



**CALIFORNIA POSTSECONDARY
EDUCATION COMMISSION**

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CONCERNING ACCREDITATION PROCEDURES AND PROCESSES**

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**CALIFORNIA POSTSECONDARY EDUCATION COMMISSION
1020 Twelfth Street, Sacramento, California 95814**

Commission Report 84-14

Adopted April 30, 1984

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BACKGROUND

The Legislature, through the enactment of Senate Bill 707 - Montoya (Chapter 1303, Statutes of 1983), directed the Postsecondary Education Commission to (1) report on the review and appeals processes available to institutions recognized to award degrees under Section 94310(a) of the Education Code, (2) review the standards and procedures utilized by national and regional accrediting associations in the accreditation of postsecondary institutions, and (3) make suggestions and recommendations where appropriate about public policy at the state level regarding state uses of accreditation. (Appendix A reproduces the relevant section of SB 707). This report was prepared in response to that request

One year prior to the enactment of Senate Bill 707, the Commission initiated a study to assess the State's utilization of accreditation and to identify those areas, if any, where such uses can be improved. This longer, more comprehensive report is scheduled for final action by the Commission in July, and it will be forwarded to the Legislature at that time. Among the issues considered in that report are the following

- How does the State rely on accreditation, and does such reliance serve public policy? Are there areas in which the State relies too little or too much on non-governmental accreditation?
- What are the direct and indirect costs of accreditation to public institutions, and does this expenditure seem to be a worthwhile investment of public funds?
- Do accrediting agencies adequately review the out-of-region and off-campus offerings of accredited institutions operating in California? Is greater cooperation between such agencies and California's state oversight agency needed to improve the review of these programs?

Individuals interested in accreditation issues beyond those specifically requested in Senate Bill 707 are directed to that Commission report, entitled "Public Policy and Accreditation in California," which is currently available in draft form

PART ONE: REVIEW AND APPEALS PROCESSES

Private postsecondary institutions are eligible to offer degrees in California under Section 94310(a) of the Education Code if they are accredited by (1) a national accrediting agency recognized by the U.S. Secretary of Education, (2) by the Western Association of Schools and Colleges (WASC) or (3) by the Committee of Bar Examiners of the State of California. There are four national accrediting associations recognized by the U.S. Secretary of Education and the Council on Postsecondary Accreditation: the American Association of Bible Colleges (AABC), the Association of Independent Colleges and Schools (AICS), the National Association of Trade and Technical Schools (NATTS), and

the National Home Study Council. All four of these associations are similar to WASC in that they accredit entire institutions rather than specific programs. However, the postsecondary institutions they work with offer education either in limited areas -- bible colleges, business, or technical-vocational subjects -- or solely via correspondence. The Committee of Bar Examiners is substantially different from the other accrediting associations included in Section 94310(a) of the Education Code, in that the Committee was created through statute in 1927 with the passage of the State Bar Act. The State Bar of California is a public corporation, and the Committee of Bar Examiners is the part of the corporation empowered to accredit law schools in California.

In the preparation of this report, review and appeals processes of accrediting associations were examined on the basis of the following criteria:

1. The type of actions by accrediting associations which institutions have the right to appeal.
2. The specific grounds on which an institution is considered to have the right to file an appeal.
3. The authority of the appeals board -- does the board have the authority to grant the relief requested by the appealing institution, or is the authority limited to sustaining a decision or remanding the matter back for further consideration.
4. Does the review and appeals process include a new visit to the applicant institution?
5. The composition of the appeals board -- who appoints the board members and are there restrictions on those eligible to serve so as to eliminate those individuals who might have a conflict of interest?
6. Limitations on the availability of information to the institution filing the appeal -- is there any information made available to the appeals board which is not available to the institution filing the appeal?

In addition, the review and appeals process of WASC has been compared to the similar processes of the other five regional accrediting associations recognized by the U.S. Secretary of Education.

Findings and Conclusions

The following findings and conclusions can be made about the review and appeals process available to institutions which operate under Section 94310(a) of the Education Code:

1. The review and appeals process utilized by the six regional accrediting associations (including WASC) is generally similar from association to association. (For more detailed information, see Appendix B.) This process typically includes the following components:

- a. Institutions are eligible to appeal those decisions by accrediting associations which include denial of candidacy or the renewal of candidacy, denial of accreditation or reaffirmation of accreditation, or termination of candidacy or accreditation.
 - b. Institutions are eligible to appeal decisions by accrediting associations on the basis of one or more of the following grounds: (1) errors or omissions in carrying out the accreditation procedures; (2) demonstrable bias or prejudice by one or more members of either the evaluation team and/or the accrediting association; (3) the evidence utilized in making the decision was materially in error; or (4) the decision by the accrediting association was not adequately supported by the available evidence.
 - c. Evidence is presented to the hearing panel by representatives of both the appealing institution and the accrediting association. The hearing panel does not revisit the institution and seek to gather new information.
 - d. Members of the hearing panel are usually appointed by either the executive board or the chief executive officer of the accrediting association, with the requirement that none of the members of the hearing panel shall have been involved in the accreditation process which resulted in the appeal.
 - e. Representatives of both the appealing institution and the accrediting association have equal access to all information presented to the hearing panel, so that no information is kept confidential from either party.
2. The major difference in the review and appeals process among the six regional accrediting associations concerns the authority of the appeals board. In two of the regional associations (the Southern and Northwest Associations), the appeals board has the authority to grant the relief requested by the appealing institution, if such a decision is appropriate. In three of the regional associations (the Middle States, New England, and North Central Associations), if the appeals board finds that the institution's appeal should be sustained, the matter is remanded to the accrediting commission for reconsideration. In the Western Association, the appeals board has the authority to grant the relief requested by the institution only in those situations when it determines the decision of the accrediting commission was not adequately supported by the evidence. In all other situations, if the appeals board finds for the institution, the issue is remanded to the accrediting commission for reconsideration.
 3. There are two areas in which the review and appeals process of WASC is different from that utilized by the other regional associations.
 - a. WASC is the only regional association which has a two-step review and appeals process. During the first step, an institution may file for an internal review by a committee of either the Senior or Community College Commissions. The members of this review committee are selected by the chair of the appropriate accrediting commission. However, there are no provisions which require that members of this

review committee not be involved in the accreditation process which resulted in the appeal. During the second step of the process, the institution makes an appeal before the WASC Hearing Panel, whose members are annually elected by the WASC Board of Directors with the stipulation that none of the members have been involved in the accreditation process which resulted in the appeal.

- b. WASC is the only regional association which includes a visit to the institution by the review panel as a part of the review process. This visit to the institution occurs during the first step of the review and appeals process.
4. The review and appeals process utilized by the four national accrediting associations is generally not as detailed and as thorough as the process utilized by the regional associations. For example, there is less provision for institutional rights of a hearing before a review board independent of the accrediting association. More limitations are also placed on the range of actions which can be appeals, with the Accrediting Commission of the Association of Independent Colleges and Schools, for example, not allowing the appeal of a negative decision to deny accreditation.
5. Institutions accredited by the Committee of Bar Examiners for the State of California are the only institutions operating under Section 94310(a) of the Education Code which do not have access to a formal review and appeals procedure such as that described in Conclusion 1 on page 3. The "Standards and Procedures for Preliminary Approval and Accreditation of Law Schools" maintained by the Committee do not include any provision for institutions to seek the review and appeal of accreditation decisions, other than an appeal to the California State Supreme Court.

PART TWO. ACCREDITATION STANDARDS AND PROCEDURES UTILIZED BY REGIONAL ASSOCIATIONS

The Western Association of Schools and Colleges, whose geographic service area now includes California, Hawaii, the territories of Guam and American Samoa, the Micronesian Islands, and American overseas schools in East Asia, is actually three separate accrediting commissions:

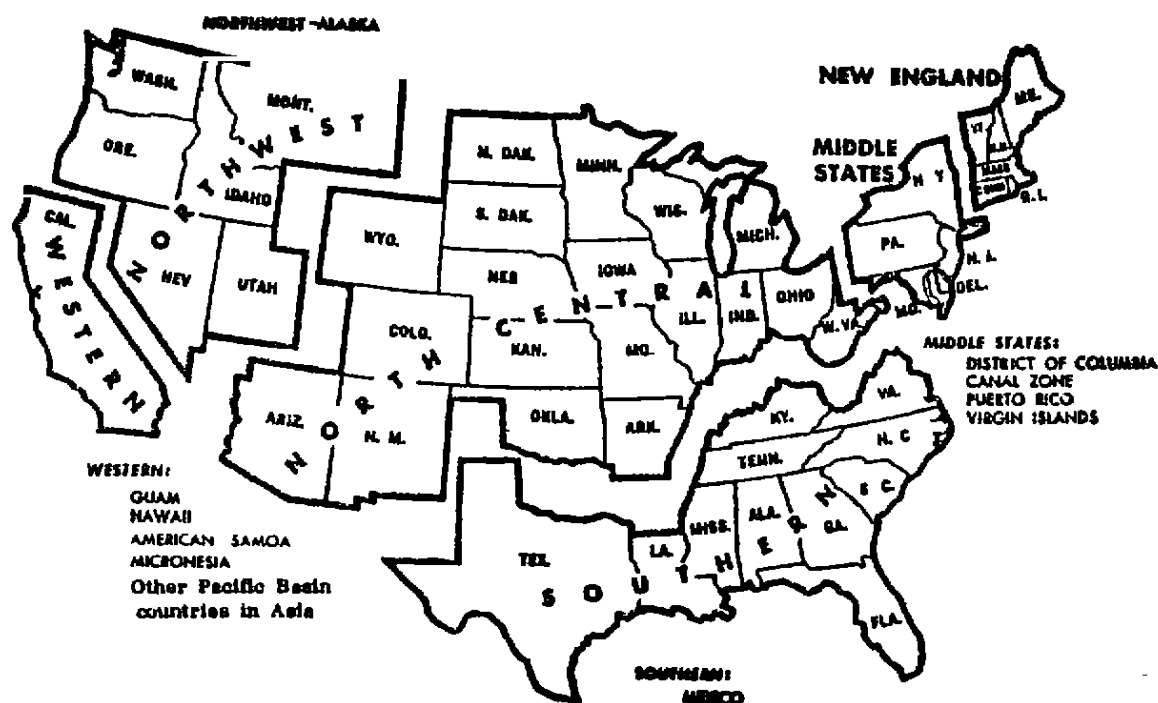
- The Accrediting Commission for Senior Colleges and Universities (often called the Senior Commission), which currently has accredited 132 four-year and graduate institutions;

- The Accrediting Commission for Community and Junior Colleges, which has accredited 140 one- and two-year postsecondary institutions; and
- The Accrediting Commission for Schools, which has accredited approximately 1,400 elementary, secondary, and adult schools.

All three commissions are recognized by the U.S. Secretary of Education. Each of the commissions develops its own standards, procedures, and fiscal policies, subject to the approval of the WASC Board of Directors, and appoints its own executive director. The Board of Directors consists of nine members -- three representatives from each of the Commissions.

In addition, five other regional accrediting associations are recognized by the Secretary of Education for accrediting educational institutions in their respective regions. These six associations are depicted on the map below.

FIGURE 1 Regional Accrediting Associations of the United States



During the past decade, the six regional associations have tried to develop cooperative strategies to improve the oversight of off-campus operations by accredited institutions. Since the mid-1970s, many colleges and universities have developed extensive off-campus programs, extending their operations across both State boundaries and regional accrediting association boundaries. Some of these educational programs, however, have not been offered at an acceptable level of quality, as a result of several factors:

- institutions have sponsored programs off campus for which they have no counterparts on campus;
- institutions have offered off-campus programs that require little or no involvement or oversight by on-campus faculty, and in some cases, contract out responsibility for the off-campus units to a non-academic authority;
- institutions formalize a differential standard of quality for credits earned off campus compared with those earned on campus; and
- off-campus offerings range from relatively large permanent educational units to short-term programs consisting of one course, one faculty member hired locally, and a handful of students.

California policy regarding the oversight of operations by out-of-state institutions has remained consistent during the past two decades. Non-accredited institutions from outside California which sought to offer programs in the State have been required to meet the standards maintained by the State oversight agency (the State Department of Education) for all non-accredited institutions. The responsibility for the oversight of out-of-state accredited institutions has been delegated to the appropriate accrediting agency. However, during the past ten years, the regional accrediting commissions have adopted dissimilar approaches in responding to this issue, and consequently the public interests have not always been well-served in this area.

The regional accrediting associations, working through the Council on Post-secondary Accreditation (a confederation of national, regional, and specialized accrediting associations) have made several generally unsuccessful efforts at agreement in response to this problem. The first was based on a memorandum adopted by COPA in August 1977, which provided policy guidelines for the regional associations. In 1981, in response to indications that the oversight of out-of-region operations was still inadequate, a revised statement of joint visitation procedures was approved. Later in the same year, in an effort to develop new policy directions, a proposal was adopted in principle "for each regional association to be responsible for all education programs operating in its region, including those programs of institutions from outside the region, with reports of evaluation going to the home regional for institutional action " This proposal was discussed further at subsequent meetings of COPA, but in Spring 1982, it was dropped because of a lack of consensus among the regional associations.

The third and most recent effort was the approval in principle in October 1982 by the directors of all six regional associations that (1) the home regional association would retain accrediting authority for all branches of an institution, wherever located; (2) while the standards of the home region would be used in making a final accrediting decision, the standards of both

associations would be used in conducting the visit; and (3) the accreditation teams would include evaluations from both regions. While this agreement was modified to some extent in April 1983, it remains the current policy recommended by COPA. The major weaknesses in this agreement are the absence of any mechanism for COPA to use in enforcing the agreement and the failure of the regional associations to adopt a common strategy in implementing the policy.

The six regional associations vary considerably in their size and in the number of member institutions (see Table 1 on page 8). By far, the largest is the North Central Association of Colleges and Schools, which includes 19 states and 915 accredited institutions. The Southern Association is also large, including more than 700 accrediting institutions and 11 states. The Western Association has the smallest number of member states, covering California and Hawaii, plus Guam, American Samoa, Micronesia, and other Pacific Basin countries in Asia. The Western Association, including both the Senior and Community Colleges Commissions, accredits approximately 270 institutions, making it the fourth largest regional association in terms of member institutions. (See Appendix C for a listing of these institutions.)

The accreditation procedures are generally similar among the six regional associations. These procedures for initial accreditation as well as reaffirmation of accreditation include the following steps:

- The institution prepares a self-study report following the criteria and guidelines provided by the accrediting commission. Staff from the commission provide some assistance to the institution during this phase.
- The commission organizes a team of peer evaluators who review the self-study report and then make a site visit at the institution.
- During the site visit, the team meets with administrators, faculty, and students, reviews additional materials provided by the institution; seeks to identify problem areas not discussed in the self-study report; assesses the quality of the educational program using standards provided by the accrediting agency; and makes an oral report to the administrators and faculty about their initial conclusions.
- The team, under the direction of the chair, prepares a report with conclusions and recommendations, with the institution provided the opportunity to correct errors of fact. The final team report and the institutional response (if any) are then forwarded to the accrediting commission.
- The commission reviews the report and makes a determination for candidacy, accreditation, reaffirmation, deferral, warning, probation, show cause, denial or revocation of candidacy, or denial or withdrawal of accreditation, as appropriate.
- At the time of commission action, the chief executive officer of the institution and the visiting team chair can appear before the commission to discuss the report. The opportunity for institutional appeal comes only after final accreditation action has been taken.

TABLE 1 Comparison of Regional Accrediting Associations

	<u>Scope of Accreditation</u>	<u>Number of Member Institutions</u>	<u>Number of States Included in the Association</u>	<u>Membership</u>	<u>Maximum Length of Accreditation</u>	<u>Annual Accreditation Fee (1981-82)</u>
Middle States Association of Colleges and Schools	Degree and non-degree institutions with educational programs at least one year in length	485 accredited institutions 22 candidate institutions	5 states + the District of Columbia, Puerto Rico, Virgin Islands, and the Republic of Panama	21 from accredited institutions 3 public members	5 years	\$450 - \$3,600
New England Association of Schools and Colleges --Institutes of Higher Education	Degree granting institutions	194 accredited institutions 4 candidate institutions	6 states designated overseas areas	14 from accredited institutions 2 public members	10 years	\$792 - \$2,455
New England Association of Schools and Colleges --Vocational Technical Institutions	one- or two-year colleges which offer certificate	35 accredited institutions 9 candidate institutions	6 states	14 from accredited institutions	10 years	\$839 - \$1,349
North Central Association of Colleges and Schools	Degree and non-degree granting institutions	915 accredited institutions	19 states	12 from accredited institutions 2 public members	10 years	\$330 - \$1,635
Northwest Association of Schools and Colleges	Degree and non-degree granting institutions	143 accredited institutions 13 candidate institutions	7 states	18 from accredited institutions 3 public members 2 from institutions of an adjoining region or regions	6 years	\$600 - \$3,900
Southern Association of Colleges and Schools --Colleges Commission	Degree granting institutions	722 accredited institutions	11 states	66 members, including 5 public members	10 years	\$870 - \$2,610
Southern Association of Colleges and Schools --Occupational Education	Non-degree granting institutions	191 accredited institutions	11 states	19 members, including 1 member at large and 2 representing business and industry	5 years	\$750 - \$3,000
Western Association of Schools and Colleges --Junior Commission	Institutions with programs leading to post-secondary certificates, diplomas, associate	131 accredited institutions 11 candidate institutions	2 states, plus Guam and the Trust Territories	17 members, including 3 public members and 5 faculty members	10 years	\$750 - \$1,050
Western Association of Schools and Colleges --Senior Commission	Degree-granting institutions with programs more than two years in length	133 accredited institutions 10 candidate institutions	2 states, plus Guam and the Trust Territories	Not a membership organization--Commission members appointed by the Western College Association	10 years	\$800 - \$3,500

- For four of the regional associations, the maximum length of accreditation is ten years. The Middle States Association and the Northwest Association grant a maximum period of accreditation of five years and six years, respectively. Between scheduled visits, the institution is expected to respond to the visiting team's recommendations, and institutions on a ten-year cycle are usually required to file a fifth-year report.

Despite the similarity in accreditation procedures, there are considerable differences in the accreditation standards utilized by the six regional associations. These accreditation standards were examined on the basis of the following criteria, with a summary provided in chart #2:

1. Purposes of accreditation -- what judgment does the accrediting association make about an institution which is determined to be in compliance with the accreditation standards?
2. Standards of accreditation -- are the standards generalized or specific, and how much detail is provided in standards as a guide to members of the visiting team and the accrediting commission as they utilize these standards in making decisions about the institution?
3. Specific standards on faculty qualifications and competency -- how detailed and prescriptive are the accreditation standards regarding faculty qualifications and competency?
4. Specific standards on institutional governance -- how detailed and prescriptive are the accreditation standards regarding institutional governance?
5. Provisions for non-traditional institutions -- are special standards provided for non-traditional institutions, or are they expected to comply with the same standards as all other institutions?
6. Year when the standards were adopted -- when were the current standards last revised and adopted?

Findings and Conclusions

The following findings and conclusions can be made about the accreditation standards utilized by the six regional accrediting associations:

- As is evidenced by the information presented in Table 2 on pages 10-11, the accreditation standards vary among the six regional associations.
- The Western and Southern Associations, particularly the former, have the most detailed and specific set of standards. At the other end of the spectrum, the North Central Association does not have standards for accreditation but rather utilizes four "intentionally general" evaluative criteria to make judgments about institutions. The other three associations have accreditation standards, but they are presented in more general terminology than the format used by the Western and Southern Associations.

TABLE 2 Summary of the Purposes and Standards of Accreditation

Criterion	Middle States Association	New England Association (Institutes of Higher Education)	North Central Association
1. Purposes of Accreditation	To attest that an institution is guided by well-defined and appropriate objectives, that it is accomplishing them substantially, and that it is so organized, staffed, and supported that it can be expected to continue to do so.	To signify that an institution has been carefully evaluated and has been found to follow basic educational policies, practices, and standards comparable to those of other member institutions of its type.	To provide public certification that an institution is of acceptable quality.
2. Standards of Accreditation	Standards are presented in 13 areas: purposes and objectives; program; outcomes; admissions and student services; faculty; organization and administration; board of trustees; resources; library/learning center; plant and equipment; financing and accounting; innovation and experimentation; and catalogs and other publications. These standards are relatively general.	Standards are presented in 12 areas: objectives; evaluation and planning; organization and governance; programs and instruction; special activities; faculty; student services; library and learning resources; physical resources; financial resources; ethical standards, and publications and advertising. These standards are relatively general.	Standards for accreditation are not provided. Instead, four intentionally general evaluation criteria are used (1) the institution has clear and publicly stated purposes, consistent with its mission and appropriate to a postsecondary institution, (2) the institution has adequate human, financial, and physical resources to accomplish its purposes; (3) it is accomplishing its purposes; and (4) it can continue to accomplish its purposes.
3. Specific Standards on Faculty Qualifications and Competency	Faculty must consist of competent, professionally prepared, interested individuals, each fully ready to accept responsibility for maintaining the highest level of professional competence.	The preparation and qualifications of all members of the instructional staff should be suited to the field and level of their assignments. Those in the conventional academic fields should hold advanced degrees or present evidence of scholarship or creative achievement appropriate to their positions.	No standards in this area.
4. Specific Standards on Institutional Governance	The overall control and support of an institution's plans and operation are the responsibility of the board of trustees. The board is responsible for seeing that the institution is what it is intended to be, that it fulfills the purposes for which it was founded, and ensures its continuance. The board is entrusted with the institution's property and assets, as well as for upholding the institution's reason for being.	The governing board is the legally constituted body which holds the property and assets of the institution in trust. It is responsible for sustaining the institution and its objectives; it should exercise ultimate and general control over its affairs. . . The faculty should have a major role in developing and conducting the academic program and in maintaining the standards and conditions which pertain directly to instruction and research.	No standards in this area.
5. Provisions for Nontraditional Institutions	All traditional and non-traditional institutions are expected to demonstrate they comply with the "characteristics of excellence in higher education" which are presented as the qualities and characteristics that distinguish superior educational institutions.	Nontraditional institutions are expected to demonstrate that they comply with the intent of the standards. "Institutions whose policies, practices, or resources differ significantly from those described in the <u>Standards</u> or which make extensive use of nontraditional formats, modes, or techniques of education, must present evidence that these are appropriate to higher education, and are effective (though alternative) means for achieving the intent of the standards."	Each institution is to be judged on the basis of its own purposes, and the evaluation criteria are extremely generalized so that they are applicable to all types of institutions.
6. Year When Standards Were Adopted	1978	1979	1981

Utilized by the Six Regional Accrediting Associations

Northwest Association

To attest that an institution's own goals are soundly conceived, its educational programs have been intelligently devised, its purposes are being accomplished, and the institution is so organized, staffed, and supported that it should continue to merit such confidence

Eleven standards are utilized: institutional objectives and statement of purposes, finance, physical plant, materials, and equipment, library and learning resources, educational program, continuing education and special instructional activities; instructional staff; administration; students, research, and graduate program. The standards are relatively general.

The preparation and experience of the faculty are significant factors in determining the quality of an institution and should be such as to further the purposes of the institution.

The governing board should have a clear idea of its general duties and responsibilities and should seek to define them in an official policy statement. A clear differentiation between the policy-making function of the board and the executive responsibilities of those who carry out these policies is essential.

A separate set of policies and principles are presented for nontraditional institutions, based on the belief that, "at this early stage in the development of non-traditional degree programs, the principles, policies, and procedures specified for accreditation must be flexible and of an interim nature."

Southern Association (Colleges Commission)

To attest that an institution has clear educational goals and objectives, maintains a system of educational delivery that embraces and affords the necessary learning, and employs instruments for the assessment of the attainments of students that would be acceptable if independently examined by experts in the field.

Eleven standards of accreditation are utilized: institutional objectives and statement of purposes; finance, physical plant, materials, and equipment; library and learning resources; educational program; continuing education and special instructional activities; instructional staff; administration; students; research; and graduate program. The standards are presented in considerable detail

All teaching faculty members must have special competence in the fields in which they teach. This special competence is attested to by advanced study, culminating in appropriate advanced degrees, or by extensive work experience in the teaching fields or in a professional practice which is demonstrably of highest quality.

The responsibilities of the governing board include establishing broad institutional policies, securing financial resources to support adequately the institution's program, and selecting the chief administrative officer. ...There should be a clear differentiation between the policy-making functions of the governing board and the responsibility of those in charge of administering these policies. The chief administrative office should be free to administer the institution within the broad policies laid down by the board.

Nontraditional institutions are expected to meet the same standards as all other institutions. Variances with the standards are allowed on the basis of (1) credible evidence that one or more specific elements of the standards is educationally dysfunctional with reference to the unconventional characteristics of the institution or its program, and (2) credible evidence of evaluation procedures which certify the effective learning outcomes of students so as to validate the unconventional effort in terms of its acceptable educational purpose.

Western Association (Senior Commission)

To assure that an institution has clearly defined educational objectives appropriate to higher education and consistent with Commission standards, that it appears in fact to be accomplishing them substantially, and can be expected to continue to achieve these objectives.

Nine standards of accreditation are utilized: institutional integrity; purposes; governance and administration; educational programs; faculty and staff, library, computer, and other learning resources; student services and activities; physical resources, and financial resources. These standards are presented in considerable detail, with specific requirements included

Members of the faculty are qualified by training and experience to serve at the levels that the institution's purposes require. For example, doctoral candidates have research supervision from faculty who have research experience and/or appropriate field experience well beyond their own dissertations

The governing board selects a chief executive officer, approves the purposes of the institution, and concerns itself with the provision of adequate funds. The board is ultimately responsible for the quality of the institution through an organized system of institutional planning and evaluation. The role of faculty in institutional governance is both substantive and clearly defined. The role of students in institutional governance is clearly stated and publicized.

Nontraditional institutions are expected to meet the same standards as all other institutions. "Some institutions may find it difficult to comply precisely with the standards which are usually more closely identified with traditional practice. In such cases, demonstration of equivalency of quality or accomplishment of the objective of the standards is the responsibility of the institution."

Accreditation standards are used as a guide by members of the visiting team and the accrediting commission in making accreditation decisions about institutions, and the more generalized the standards, the more discretion is given to the individual members to make qualitative judgments about each institution.

- The Western Association is the only regional association which explicitly states that an institution must maintain an educational program which is both appropriate to higher education and consistent with Commission standards. The North Central Association is the only regional association which explicitly states that an institution will be judged on the basis of its own purposes. The other four associations use language which seems to place them in accord with the approach utilized by the Western Association.
- The Northwest Association is the only regional accrediting association which has a separate set of policies and principles for non-traditional institutions. The Western Association had a similar set of separate policies and principles from 1979 through 1981. However, in March 1982, these policies and principles were integrated into the standards for all institutions, so that non-traditional institutions are now expected to demonstrate "equivalency of quality or accomplishment of the objectives of the standards." The Southern Association utilizes an approach similar to that of the Western Association, while the New England and Middle States Associations expect non-traditional institutions to demonstrate their compliance with the intent and purpose of the standards. For the North Central Association, each institution is judged on the basis of its own purposes, and consequently the generalized evaluation criteria are applicable to all types of institutions, including non-traditional.
- The Western and Southern Associations have the most specific standards regarding both faculty qualifications and competency and institutional governance. The North Central Association has no standards in either area, while the New England, Middle States, and Northwest Associations have relatively generalized statements.
- The accreditation standards for all six of the associations have undergone review and revision during the past seven years. The most recent revisions were made by the Western and Northwest Associations, in 1982. The Southern Association has the oldest set of standards, which were adopted in 1977.
- Existing inter-regional cooperative agreements among the six regional accrediting associations do not provide necessary oversight of accredited out-of-state institutions operating in California. The accreditation standards vary among the six associations, with the Western Association having the most detailed and specific. Moreover, while the regional associations have tried to work together wherever possible, they have not always adopted a common strategy to implement the cooperative agreements.
- The change in law, effective in July 1983, which required all out-of-state institutions operating as accredited institutions in California to be accredited by WASC rather than the other regional associations has improved the oversight of private postsecondary institutions. During the eight months in which the Senior Commission of WASC has been carrying out

this new responsibility for accrediting out-of-state operations in California, it has found that of the six institutions which applied for WASC accreditation, only one had ever been visited by its home accrediting association. The other five had been operating as accredited institutions without any on-site review by their accrediting association.

APPENDIX A
SENATE BILL 707

— 13 —

SB 707

(b) An institution's willful violation of the provisions of Section 94343 may be grounds for the revocation of that institution's approval or authorization to operate in this state

SEC. 6. Section 94343 of the Education Code, as amended by Section 4 of this act, shall become operative upon the date of the first quarterly reporting period following the effective date of this act

SEC 7 (a) The amendment made to Section 94310 of the Education Code by Section 2 of this act shall be deemed to have become operative on July 1, 1983

(b) The Superintendent of Public Instruction shall take all actions necessary to give effect to subdivision (a), and those actions are hereby ratified, validated, and confirmed

SEC 8. The Superintendent of Public Instruction and the California Postsecondary Education Commission shall report to the Legislature by March 30, 1984, on the review and appeals process for institutions recognized under subdivision (a) of Section 94310 of the Education Code, with recommendations for appropriate state oversight. The report shall include a review of procedures utilized by national and regional accrediting associations, with suggestions for public policy at the state level regarding state uses of accreditation

SEC. 9. This act is an urgency statute necessary for the immediate preservation of the public peace, health, or safety within the meaning of Article IV of the Constitution and shall go into immediate effect. The facts constituting the necessity are.

In order to permit the new assessment rate established pursuant to Section 2 of this act to take effect at the earliest possible date, and in order to allow private postsecondary educational institutions to continue to issue degrees without interruption, it is necessary that this act take effect immediately.

APPENDIX B
THE REVIEW AND APPEALS PROCESS
OF REGIONAL ACCREDITING ASSOCIATIONS

Middle State Association of Colleges and Schools	18
New England Association of Schools and Colleges	19
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MIDDLE STATES ASSOCIATION OF COLLEGES AND SCHOOLS

1. The type of actions by the Middle States Association of Colleges and Schools which are appealable include (a) rejection of any application for accreditation, (b) refusal to reaffirm or a decision to withdraw an existing accreditation of a member institution; or (c) reduction of the period during which an existing accreditation had been granted.
2. The review and appeals procedure of the Middle States Association does not specifically identify the grounds on which an appeal must be based.
3. The appeals board of the Middle States Association may either (1) sustain the accreditation decision of the Commission, or (2) remand the case to the Commission with instruction to grant the application or to make further investigation as may be appropriate. The decision of the appeals board may be reviewed by the Board of Trustees of the Association, at the request of either the applicant or the Commission, and the affirmative vote of a majority of the full Board. Members of the appeals panel do not participate in the deliberations of the Board in this review.
4. The review and appeals process of the Middle States Association does not provide for a visit to the institution by the appeals board.
5. The President of the Middle States Association has the authority to appoint each year a pool of ten members of the 18-member Board of Trustees to serve in panels of five members each with respect to each appeal. When an appeal is made by a postsecondary institution, at least three members of the appeals panel shall be from the field of higher education. There are no other provisions of the review and appeal procedures which restrict who is eligible to serve on this appeals committee.
6. The review and appeals procedure of the Middle States Association does not discuss any limitations on the availability of information to the institution filing the appeal.

Source: "Middle States Association: Charter and By-Laws," Article IX: Review and Appeal Procedures, p. 14-18, Middle States Association of Colleges and Schools, December 5, 1982.

NEW ENGLAND ASSOCIATION OF SCHOOLS AND COLLEGES

1. The type of actions by the New England Association of Schools and Colleges which are appealable include (a) denial of candidacy for accreditation, (b) termination of candidacy for accreditation, (c) denial of accreditation, (d) placement on probation, and (e) termination of accreditation.
2. A decision by the New England Association may be appealed on the basis of one or more of the following grounds: (a) departure from the procedures established by written policy or agreement or by recognized custom; (b) the citing of factually incorrect information as a basis for the accreditation decision; (c) demonstrable bias on the part of evaluators, Commissioners, or the Commission's professional staff; and (d) an arbitrary and capricious recommendation.
3. The appeals board of the New England Association does not have the authority to grant the relief requested by the appealing institution. If the appeals board finds that the institution's appeal should be sustained, the matter is remanded to the Commission for reconsideration.
4. The review and appeals process of the New England Association does not provide for a visit to the institution by the appeals board.
5. The membership of each Appeals Committee is elected by the Executive Committee of the New England Association from a slate of candidates prepared by a Nominating Committee. There are no explicit provisions in the appeals procedures of the New England Association which restrict who is eligible to serve on this appeals committee.
6. The review and appeals procedure of the New England Association does not discuss any limitations on the availability of information to the institution filing the appeal. The appeals policy does stipulate that the Appeals Committee shall not meet separately with representatives of either the affected institution or the Commission.

Source: "Policy and Procedure for the Appeal of Adverse Action Affecting Institutional Accreditation or Candidate for Accreditation Status," New England Association of Schools and Colleges, Inc., November 1, 1982.

NORTH CENTRAL ASSOCIATION OF COLLEGES AND SCHOOLS

1. The type of actions by the North Central Association which are appealable include those which deny or withdraw membership or other affiliation of the institution with the association.
2. A decision by the North Central Association may be appealed on the basis of one or more of the following grounds: (a) the decision was based on factual information that was substantially incorrect; (b) the decision was not adequately supported by the available factual information; (c) the decision was based on factual information not related to the Commission's criteria for such decisions; and (d) in making the decision, the accrediting commission significantly departed from its written or customary procedures.
3. The appeals board of the North Central Association does not have the authority to grant the relief requested by the appealing institution. If the board sustains the appeal of the institution, the decision is remanded to the accrediting commission for correction of errors or omissions and for reconsideration of the institution's status.
4. The review and appeals process of the North Central Association does not provide for a visit to the institution by the appeals board.
5. The Board of Directors of the North Central Association has the authority to establish two standing six-person appeals panels. One panel shall comprise persons nominated by the Commission on Schools, and the second panel shall comprise persons nominated by the Commission on Institutions of Higher Education. In response to an appeal by a postsecondary institution, a five-person appeal committee is established with two members drawn from the first panel and three members drawn from the second panel. Individuals who have participated in any way in the process leading to the decision being appealed are ineligible to participate on the appeals committee.
6. The review and appeals procedure of the North Central Association does not discuss any limitations on the availability of information to the institution filing the appeal. The procedures do specify that during the hearing, institutional and Commission representatives shall attend together so that both parties are present for the same discussions.

Source: "Summary of Appeals Procedures," North Central Association of Colleges and Schools, Fall 1983.

NORTHWEST ASSOCIATION OF SCHOOLS AND COLLEGES

1. The type of actions by the Northwest Association of Schools and Colleges which are appealable include (a) denial of candidacy, (b) removal of candidacy, (c) denial of membership (accreditation), and (d) removal of membership (accreditation).
2. A decision by the Northwest Association of Schools and Colleges may be appealed on the basis of one or more of the following grounds: (a) there were errors and omissions in carrying out prescribed procedures by either the evaluation team and/or the Commission, (b) there was demonstrable bias or prejudice on the part of one or more members of the evaluation team or the Commission, (c) the evidence utilized in making the decision was materially in error, or (d) the decision by the Commission was not adequately supported by the facts or was contrary to the substantial weight of evidence.
3. The appeals board of the Northwest Association has the authority to grant the relief requested by the appealing institution, if such a decision is appropriate.
4. The review and appeals process of the Northwest Association does not provide for a visit to the institution by the appeals board.
5. The President of the Northwest Association has the authority to appoint a five-member Appeal Board to consider the appeal. No member of an Appeal Board shall be a current member of the Commission or the Board of Trustees of the Northwest Association, or shall have served on an evaluation team to the aggrieved institution. When the appeal is made by a postsecondary institution, at least three members of the Appeal Board shall be from the field of higher education.
6. The review and appeals procedure of the Northwest Association does not discuss any limitations on the availability of information to the institution filing the appeal. While the board hearing is closed, a court reporter may be present to prepare a record of the hearing, at the election and expense of the institution filing the appeal.

Source: "Appeals Policy and Procedure" of the Northwest Association of Schools and Colleges, adopted by the Board of Trustees on December 9, 1983.

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS

1. The type of actions by the Southern Association of Colleges and Schools which are appealable include (a) denial of authorization or candidacy, (b) removal from candidacy, (c) denial of membership, (d) removal from membership, or (e) placement on probation or extraordinary status.
2. The review and appeals procedure of the Southern Association does not specifically identify the grounds on which an appeal must be based.
3. The appeals board of the Southern Association has the authority to grant the relief requested by the appealing institution, if such a decision is appropriate.
4. The review and appeals process of the Southern Association does not provide for a visit to the institution by the appeals board.
5. Members of the appeals board are annually nominated by a special Nominating Committee of the College Delegate Assembly of the Southern Association. Following this nomination process, the members of the appeals board are annually elected by the College Delegate Assembly. The appeals procedures for the Southern Association stipulate that members of either the nominating committee or the appeals board shall not be serving on the Accrediting Commission or any committee of the Commission "when appointed or elected, or when serving their term of office."
6. The review and appeals procedure of the Southern Association does not discuss any limitations on the availability of information to the institution filing the appeal. However, the appeals procedures do stipulate that the institution has the right "to receive a transcript and any other related records of the proceedings, upon payment of the costs of reproduction."

Source: "Appeals Procedures of the Commission on Colleges," Southern Association of Colleges and Schools, July 1982.

WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

The Accrediting Commission for Senior Colleges and Universities and the Accrediting Commission for Community and Junior Colleges have the same two step review and appeals process. The first step of the review process, an institution may file for an internal review before a review committee of the commission. The second phase is an appeal before the WASC Hearing Panel.

Step One: An internal review to a committee of the accrediting commission.

1. The type of actions by the Senior and Community College Commissions which are appealable include (a) denial of candidacy or the renewal of candidacy, (b) denial of accreditation or reaffirmation of accreditation, (c) termination of candidacy or accreditation, or (d) a decision to place an institution on probation or show cause status.
2. The review procedures for this first step do not specifically identify the grounds on which a review must be based.
3. The review committee during this first phase does not have the authority to grant the relief requested by the appealing institution. The responsibilities of the review committee are limited to making recommendations to the accrediting commissions.
4. The review procedures for this first step require a visit to the institution.
5. The members of the review committee are selected by the chair of the accrediting Commission. There are no specified limitations on which individuals may or may not be appointed to the review committee.
6. The review procedures for this first step state that the review committee shall make a report to the accrediting commission, which is shared with the institution. The review committee shall also make confidential recommendations to the accrediting commission, which are not shared with the institution.

Step Two: An appeal to the WASC Hearing Panel.

1. Any action which is defined as appealable in step one of the review process can also be appealed in this second step, except those concerning a decision to place an institution on probation or show cause status.
2. The procedures for this second step state that an appeal shall be based on one or more of the following grounds: (a) errors or omissions in carrying out the accreditation procedures by either the evaluation team and/or the accrediting commission; (b) demonstrable bias or prejudice by one or more members of either the evaluation team and/or the accrediting commission; (c) the evidence utilized in making the decision was materially in error; or (d) the decision by the accrediting commission was not adequately supported by the facts or was contrary to the substantial weight of evidence.

3. The appeals board of the Western Association generally does not have the authority to grant the relief requested by the appealing institution unless the board finds for the institution on the fourth ground listed above. In all other situations, if the board finds for the institution the board shall remand the case to the appropriate commission for reconsideration.
4. The review and appeals process during this second step does not provide for a visit to the institution by the appeals board.
5. The WASC Board of Directors annually elects a WASC Hearing Panel consisting of 20 persons: (a) five from elementary/secondary schools, (b) five from junior or community colleges, (c) five from senior colleges and universities, and (d) five lay members of governing boards. The appeals procedure specifies that none of these individuals may be a current member of an accrediting commission. When a postsecondary institution files an appeal, a five-member Hearing Board is established, including at least one person from each of the four categories. The members are selected on a random basis from the Hearing Panel and appointed by the WASC President. The appeals procedures specify that none of the members "shall have been involved in the accreditation process which resulted in the appeal."
6. The second step of the review and appeals procedure of the Western Association does not discuss any limitations on the availability of information to the institution filing the appeal.

Sources: "Handbook of Accreditation and Policy Manual," Accrediting Commission for Community and Junior Colleges, 1981 Edition, p. 86-89. "Handbook of Accreditation," Accrediting Commission for Senior Colleges and Universities Western Association of Schools and Colleges, March 1982, p. 167-169. "Directory," Western Association of Schools and Colleges, Inc., 1983-1984, p. 7-10.

APPENDIX C

INSTITUTIONS OF HIGHER EDUCATION OPERATING IN CALIFORNIA ACCREDITED BY THE WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES, FEBRUARY 1984

CALIFORNIA INSTITUTIONS

Allan Hancock College
American Academy of Dramatic Arts West
American River College
Antelope Valley College
Armstrong College
Art Center College of Design
Azusa Pacific University
Bakersfield College
Barstow College
Bethany Bible College
Biola University
Brooks College
Brooks Institute
Butte College
Cabrillo College
California Baptist College
California College of Arts and Crafts
California College of Mortuary Science
California College of Podiatric Medicine
California Family Study Center
California Institute of the Arts
California Institute of Integral Studies
California Institute of Technology
California Lutheran College
California Maritime Academy
California Polytechnic State University, San Luis Obispo
California School of Professional Psychology
California School of Professional Psychology, Berkeley
California School of Professional Psychology, Fresno
California School of Professional Psychology, Los Angeles
California School of Professional Psychology, San Diego
California State University System
California State College, Bakersfield
California State College, San Bernardino
California State College, Stanislaus
California State Polytechnic University, Pomona
California State University, Chico
California State University, Dominguez Hills
California State University, Fresno
California State University, Fullerton
California State University, Hayward
California State University, Long Beach
California State University, Los Angeles

California State University, Northridge
 California State University, Sacramento
 Canada College
 Cerritos College
 Cerro Coso Community College
 Chabot College
 Chaffey Community College
 Chapman College
 Christ College Irvine
 Christian Heritage College
 Church Divinity School of the Pacific
 Citrus College
 City College of San Francisco
 Claremont University Center
 Claremont Graduate School
 Claremont McKenna College
 Coastline Community College
 Cogswell College
 College of Alameda
 College of the Canyons
 College of the Center for Early Education
 College of the Desert
 College of Marin
 College of Notre Dame
 College of Oceaneering
 College of the Redwoods
 College of San Mateo
 College of the Sequoias
 College of the Siskiyous
 Columbia College
 Compton Community College
 Consortium of the California State University
 Contra Costa College
 Cosumnes River College
 Crafton Hills College
 Cuesta College
 Cuyamaca College
 Cypress College
 De Anza College
 Deep Springs College
 Defense Language Institute
 Diablo Valley College
 Dominican College of San Rafael
 Dominican School of Philosophy and Theology
 Don Bosco Technical Institute
 D-Q University (Lower Division)
 East Los Angeles College
 El Camino College
 Evergreen Valley College
 The Fashion Institute of Design and Merchandising
 The Fashion Institute of Design and Merchandising - Branch Campuses
 Feather River College
 Fielding Institute
 Foothill College

Franciscan School of Theology
 Fresno City College
 Fresno Pacific College
 Fuller Theological Seminary
 Fullerton College
 Gavilan College
 Glendale Community College
 Golden Gate Baptist Theological Seminary
 Golden Gate University
 Golden West College
 Graduate Theological Union
 Grossmont College
 Hartnell Community College
 Harvey Mudd College
 Heald Colleges
 Central California Commercial College
 Heald Business College, Hayward
 Heald Business College, Sacramento
 Heald Business College, San Francisco
 Heald Business College, San Jose
 Heald Business College, Walnut Creek
 Heald Institute of Technology, San Francisco
 Heald Institute of Technology, Santa Clara
 Heald's Kelsey-Jenney College
 Hebrew Union College - Jewish Institute of Religion
 Holy Family College
 Holy Names College
 Humboldt State University
 Humphreys College
 Immaculate Heart College
 Imperial Valley College
 Indian Valley Colleges
 Jesuit School of Theology
 John F. Kennedy University
 Kings River Community College
 Lake Tahoe Community College
 Laney College
 Lassen College
 Loma Linda University
 Long Beach City College
 Los Angeles Baptist College
 Los Angeles City College
 Los Angeles Harbor College
 Los Angeles Metropolitan College
 Los Angeles Mission College
 Los Angeles Pierce College
 Los Angeles Southwest College
 Los Angeles Trade-Technical College
 Los Angeles Valley College
 Los Medanos College
 Loyola Marymount University
 Marymount Palos Verdes College
 Mendocino College
 Menlo College

Mennonite Brethren Biblical Seminary
Merced College
Merritt College
Mills College
Miracosta College
Mission College
Modesto Junior College
Monterey Institute of International Studies
Monterey Peninsula College
Moorpark College
Mount St. Mary's College
Mt. San Antonio College
Mt. San Jacinto College
Napa Valley College
National University
Naval Construction Training Center
Naval Postgraduate School
New College of California
Northrop University
Occidental College
Ohlone College
Orange Coast College
Otis Art Institute of Parsons School of Design
Oxnard College
Pacific Christian College
Pacific College
Pacific Oaks College
Pacific School of Religion
Pacific Union College
Palomar College
Palo Verde College
Pasadena City College
Patten College
Pepperdine University
Pitzer College
Point Loma Nazarene College
Pomona College
Porterville College
Queen of the Holy Rosary College
Rand Graduate Institute
Reedley College
Rio Hondo College
Riverside City College
Sacramento City College
Saddleback College
St. John's College
St. John's Seminary
St. Joseph's College Seminary
St. Mary's College of California
St. Patrick's Seminary
San Bernardino Valley College
San Diego City College
San Diego Mesa College
San Diego Miramar

San Diego State University
 San Francisco Art Institute
 San Francisco College of Mortuary Science
 San Francisco Community College District
 City College of San Francisco
 San Francisco Community College Centers
 San Francisco Conservatory of Music
 San Francisco State University
 San Francisco Theological Seminary
 San Joaquin Delta College
 San Jose City College
 San Jose State University
 Santa Ana College
 Santa Barbara City College
 Santa Monica College
 Santa Rosa Junior College
 Saybrook Institute
 School of Theology at Claremont
 Scripps College
 Shasta College
 Sierra Community College
 Simpson College
 Skyline College
 Solano Community College
 Sonoma State University
 Southern California College
 Southern California College of Optometry
 Southwestern College
 Stanford University
 Taft College
 Thomas Aquinas College
 United States International University
 University of California
 University of California, Berkeley
 University of California, Davis
 University of California, Irvine
 University of California, Los Angeles
 University of California, Riverside
 University of California, San Diego
 University of California, San Francisco
 University of California, Santa Barbara
 University of California, Santa Cruz
 University of Judaism
 University of La Verne
 University of the Pacific
 University of Redlands
 University of San Diego
 University of San Francisco
 University of Santa Clara
 University of Southern California
 University of West Los Angeles
 Ventura College
 Victor Valley College
 Vista College

West Coast Christian College
West Coast University
Western State University College of Law of Orange County
Western State University College of Law of San Diego
West Hills Community College
West Los Angeles College
Westmont College
West Valley College
Whittier College
Woodbury University
World College West
Wright Institute
Yuba College

**REGIONALLY ACCREDITED INSTITUTIONS FROM OTHER REGIONS OPERATING WASC
ACCREDITED PROGRAMS WITHIN CALIFORNIA**

Brigham Young University
College of St. Thomas
Southern Illinois University at Carbondale
Southern Illinois University at Edwardsville
Webster University